



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

October 18, 2019

Via ECF

The Honorable Valerie E. Caproni
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States of America and New York State *ex rel.* TZAC, Inc. v. Oxfam,
18 Civ. 1500 (VEC)

Dear Judge Caproni:

This Office represents the United States of America (the “United States” or “Government”) in the above-referenced *qui tam* action brought by the relator TZAC, Inc. pursuant to the False Claims Act, as amended, 31 U.S.C. § 3729 *et seq.* (the “FCA”). The Government respectfully submits this letter to request that the Court adjourn, as set forth below, the deadlines for the briefing schedule of the Government’s anticipated motion to dismiss. The Government has conferred with the relator and the defendant, who both consent to this request and the proposed adjusted briefing schedule. This is the Government’s first request for an extension of this deadline; the reason for the request is that the Government requires additional time to obtain full consultation and review of its anticipated motion within the Department of Justice.

Should the Court grant the request for an extension, the Government’s motion will be due by November 18, 2019; the relator’s response, if any, would be due by December 18, 2019; and the Government’s reply, if necessary and taking into account the holidays, would be due by January 10, 2020.

We thank the Court for its consideration of this request.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: /s/ Jessica Jean Hu
JESSICA JEAN HU
Assistant United States Attorney
86 Chambers Street, 3rd Floor
New York, NY 10007
Telephone: 212-637-2726
Facsimile: 212-637-2717
E-mail: jessica.hu@usdoj.gov

cc:

By e-mail

David Abrams, Esq.
Counsel for Relator

J. Emmett Murphy
Jeffrey S. Bucholtz
King & Spalding LLP
Counsel for Defendant